

LUCY L. THOMSON

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VIA ECF

The Honorable Martin Glenn
Chief Bankruptcy Judge
United States Bankruptcy Court for the
Southern District of New York
One Bowling Green
New York, NY 10004-1415
mg.chambers@nysb.uscourts.gov

Re: In re Celsius Network LLC, et al., Case No. 22-10964 (MG) – Request for Remote
Testimony

Dear Chief Judge Glenn:

As the Consumer Privacy Ombudsman appointed in this case, I am writing pursuant to paragraph 6 of the Order Establishing Case Management Procedures for the Confirmation Hearing [Dkt. No. 3478] to request that I be permitted to testify and be available for cross examination and re-direct examination remotely.

Pursuant to Federal Rule of Civil Procedure 43(a), “for good cause in compelling circumstances and with appropriate safeguards, the court may permit testimony in open court by contemporaneous transmission from a different location.” Fed. R. Civ. P. 43(a).

Today I have submitted my written direct testimony in connection with the Celsius Chapter 11 Plan Confirmation Hearing. I work from my office in Washington, D.C. It would difficult for me to attend the hearing in person in New York City, and believe it would be efficient and conserve scarce resource of the estate for me to testify in this case remotely. Thus, good cause exists to permit me to testify remotely from Washington, D.C. for any cross-examination that is required, and any subsequent re-direct examination, at the Confirmation Hearing.

Sincerely,

/s/ Lucy L. Thomson

Lucy L. Thomson
Consumer Privacy Ombudsman